

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 2

October 15, 2013

Ryan Furman  
Campaign Finance Analyst  
Federal Election Commission  
999 E St., NW  
Washington, DC 20463

Identification Number: C00237198

Reference: Amended July Quarterly Report (4/1/11-6/30/11), received 5/4/13

Dear Mr. Furman:

This letter is in response to your request for additional information, dated September 9, 2013.

Although our previous analyst assured the Committee that there were no further issues related to this report, your letter indicates that the Committee has disclosed contributions that appear to exceed the limits as set forth in the Act:

1. Kathleen Rooney: There are two different contributors named Kathleen Rooney. The above referenced report has been amended to clarify that these are two different people and that their contributions did not exceed the limits.
2. American Maritime Officers Voluntary PAC: The contributions on 3/31/11 came to the Committee through a joint fundraising committee and will therefore be transferred back to that committee for reallocation in accordance with the joint fundraising agreement.
3. National Association of Health Underwriters PAC: This PAC was entered in the Committee's database as two separate PACS. The Committee refunded the National Association of Health Underwriters PAC \$2500 on 10/15/13. Also, please note as described in more detail below that the new data base vendor has taken steps to eliminate these types of duplicate entries to avoid these issues in the future.
4. Copart Inc. PAC: The Committee has amended its report to accurately disclose this contribution as designated \$2500 to Primary and \$2500 to General.
5. Olsson Frank and Weeda PC Freedom PAC: The Committee reviewed the Olsson Frank and Weeda PC Freedom PAC report to determine whether the Committee has misreported this contribution. The PAC also identified this contribution as designated to the Primary and we note that it is the only such contribution in excess of the limits. We therefore believe that the PAC had likely reached its multicandidate status prior to making this contribution but failed to notify the FEC. As this PAC has been terminated, we are unable to refund any amount to the PAC.
6. Vantagepont Management Inc. PAC: The Committee has amended its report to accurately disclose this contribution as designated \$2500 to Primary and \$2500 to General.
7. COALPAC/MINEPAC: The Committee has amended its report to accurately disclose the 6/30/11 contributions as designated to the general election.
8. Exelon PAC/Constellation Energy Group Inc. Federal PAC: The contributions identified in your letter were made in 2011. The Committee's review of the Statement of Organizations for these two PAC's indicates that they became affiliated in March 2012. Contributions made prior to the affiliation are aggregated only for the purpose of determining the permissible contribution limits after affiliation. Thus, the Committee need not take any further action related to these contributions. However, the Committee has asked its database vendor to take appropriate action in identifying affiliated committees to avoid this issue in the future.
9. Renee Boehm; James Cooper; Vera Fernau; Richard Weiland: No additional action is required for these individuals.

Finally, by way of explanation, during 2011, the Committee recognized that its data base vendor was being overloaded by the volume of contributions. Many of the RFAs received in early 2011 were the result of donors who had contributed

\*\*\*\*\*